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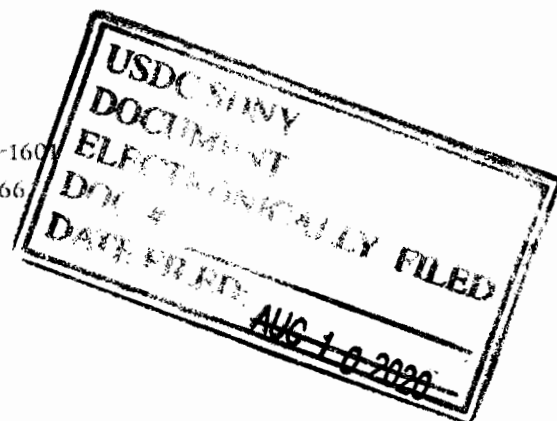
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August 5, 2020

VIA ECF

Hon. George B. Daniels
United States District Court
Southern District Court of New York
500 Pearl Street
New York, New York 10007

Re: Patricia Scott Fleming, et al. v. The City of New York, et al.
Docket No. 18-CV-4866 (GBD)
Our File No.: 120-2190

AUG 10 2020

SO ORDERED

The status conference is
scheduled for August 11, 2020
is adjourned to October 20,
2020 at 9:45 a.m.

HON. GEORGE B. DANIELS
George B. Daniels

Dear Judge Daniels:

We represent Maung Maungoo, M.D., Joon Park, M.D., Christopher LaRosa, P.A., Nurse Mahmood, Myat Win, M.D., Antonio Martinez, M.D., Corizon Health, Physician Affiliate Group of New York ("PAGNY"), New York City Health + Hospitals, Richard Holman, M.D., Nicole Lanatra, M.D., Mary Lynn Nierodzik, M.D., Roopalekha Shenoy, M.D., Aaron Stern, M.D., and Jennifer Wu, M.D.

We submit this joint letter with plaintiff's counsel and counsel for the City defendants to request that the August 11, 2020 conference be adjourned and propose the following in light of the Court's recent decision partially granting Plaintiff's Motion to Amend the Complaint and the fact that this case involves so many defendants and different and lengthy allegations:

- Plaintiff's counsel will submit a proposed Amended Complaint to defense counsel for review by August 10, 2020 which will become the operative Complaint and the parties will discuss objections, if any, by August 21, 2020;
- Plaintiff's counsel will file an Amended Complaint which incorporates the prior decisions of this Court on August 26, 2020;
- Defendants will Answer the Amended Complaint by September 28, 2020;

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HEIDELL, PITTONI, MURPHY & BACH, LLP

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- The parties will confer and anticipate submitting a proposed discovery schedule to the Court on or before October 21, 2020. If the parties encounter any discovery disputes or the Court requires a court conference, we propose that a conference be scheduled in October 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Doreen Dufficy", written in a cursive style.

Doreen Dufficy

DD:ot